

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JAMES BUSSEY,	)	
	)	
Plaintiff,	)	Civil Action File
v.	)	
	)	No. 1:25-CV-3108-VMC
SHERMELA J. WILLIAMS and	)	
DELTA COMMUNITY CREDIT	)	
UNION,	)	
	)	
Defendants.	)	

**DEFENDANT DELTA COMMUNITY CREDIT UNION'S  
CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

(1) The undersigned counsel of record for a party or proposed intervenor to this action certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

a. Plaintiff:

James Bussey

b. Defendants:

The Honorable Shermela J. Williams

Delta Community Credit Union

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case: none.

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

a. Plaintiff:

Pro se

b. Defendants:

i. The Honorable Shermela J. Williams

Unknown

ii. Delta Community Credit Union

Michael E. Brooks  
Jill Warner  
Brooks & Warner LLC  
1768 Century Boulevard NE, Suite B  
Atlanta, Georgia 30345

(4) [For every action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a).] The undersigned further certifies that the following is a full and complete list of the citizenship of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

There is no diversity jurisdiction, as each of the Parties is domiciled in Georgia. Plaintiff James Bussey purports to assert claims on the basis of federal question jurisdiction. Defendant Delta Community Credit Union has moved to dismiss this action in its entirety – as to Defendants Shermela J. Williams (“Judge Williams”) and Delta Community Credit Union – on the following grounds:

1. All of Plaintiff’s alleged claims against Judge Williams, who is a Judge on the Superior Court of Fulton County, are based on her alleged actions taken as the judge presiding over an action pending in that court (the “Superior Court Action”) between Plaintiff and the Credit Union concerning Plaintiff’s loan transactions with the Credit Union, and therefore she is entitled to absolute immunity from being sued for any of the actions alleged to have been taken in her judicial capacity;
2. All of Plaintiff’s alleged claims arise from the same loan transactions and relationship between Plaintiff and the Credit Union that are the subject of the Superior Court Action and therefore should be dismissed based on the rule against claim splitting;
3. Some of Plaintiff’s alleged claims are based on the Credit Union’s alleged litigation conduct in the Superior Court Action, and these claims should be dismissed both because they arise out of the same nucleus of operative facts and are impermissible claim splitting and because it would be

- improper for this Court to manage the interim decisions of the state Superior Court or grant any relief based on its management of and rulings in the Superior Court Action;
4. Plaintiff's alleged federal RICO conspiracy claim under 18 U.S.C. § 1962(d) should be dismissed because Plaintiff alleges no predicate acts that plausibly or even possibly could establish a pattern of racketeering activity, without which there can be no claim for a RICO conspiracy;
  5. Plaintiff's purported claim against the Credit Union for its alleged perjury in the Superior Court Action is premised on a criminal statute, 18 U.S.C. § 1621, which does not provide a private right of action; and
  6. There can be no claim against the Credit Union for alleged deprivation of Plaintiff's constitutional rights because the Credit Union is not a state actor (and the Superior Court judge is immune).

Respectfully submitted.

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Attorneys for Defendant and  
Counterclaimant Delta Community  
Credit Union

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2025, I electronically filed the foregoing DEFENDANT DELTA COMMUNITY CREDIT UNION'S CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT with the Clerk of the Court using the CM/ECF system and served the parties with a copy thereof by email to [jamesbussey72@yahoo.com](mailto:jamesbussey72@yahoo.com) and [Brittney.Green@fultoncountyga.gov](mailto:Brittney.Green@fultoncountyga.gov) and by depositing it in the United States mail, properly addressed with sufficient postage affixed thereto to ensure delivery to the following:

Mr. James Bussey  
455 Liberty Trace  
Roswell, Georgia 30076

The Honorable Shermela J. Williams  
c/o Brittney N. Green, Senior Staff Attorney  
Superior Court of Fulton County  
Justice Tower Center  
185 Central Avenue, Suite T-4655  
Atlanta, Georgia 30303

/s/Michael E. Brooks  
Michael E. Brooks

Counsel for Defendant and Counterclaimant  
Delta Community Credit Union